

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

AARON SIEGEL, JASON COOK,  
JOSEPH DELUCA, NICOLE CUOZZO,  
TIMOTHY VARGA, CHRISTOPHER  
STAMOS, KIM HENRY, AND  
ASSOCIATION OF NEW JERSEY RIFLE  
AND PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Attorney General of the State of  
New Jersey; and PATRICK CALLAHAN,  
in his official capacity as Superintendent of  
the New Jersey State Police,

Defendants.

Hon. Renée Marie Bumb, U.S.D.J.  
Hon. Ann Marie Donio, U.S.M.J.

Docket No. 22-CV-7463

RONALD KOONS; NICHOLAS  
GAUDIO; JEFFREY M. MULLER; GIL  
TAL; SECOND AMENDMENT  
FOUNDATION; FIREARMS POLICY  
COALITION, INC.; COALITION OF  
NEW JERSEY FIREARM OWNERS; and  
NEW JERSEY SECOND AMENDMENT  
SOCIETY,

*Plaintiffs,*

v.

MATTHEW J. PLATKIN, in his official

Hon. Reéne Marie Bumb, U.S.D.J.  
Hon. Ann Marie Donio, U.S.M.J.

Docket No. 22-CV-7464

capacity as Attorney General of the State of New Jersey; and PATRICK CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police,

*Defendants.*

**ATTORNEY DECLARATION OF ANGELA CAI IN SUPPORT OF  
MOTION TO FILE AN OVERLENGTH BRIEF**

I, ANGELA CAI, of full age, hereby declare as follows:

1. I am employed as Deputy Solicitor General by the State of New Jersey, Department of Law and Public Safety. I submit this declaration in support of Defendants' motion to file an overlength brief.
2. The above-captioned consolidated matters concern sweeping constitutional challenges to a newly enacted firearms statute, P.L. 2022 Chapter 131, and provisions of New Jersey law that predate the new legislative enactment.
3. Consolidation was granted in this case on January 12, 2023.
4. Previous TRO proceedings in these consolidated cases included:
  - 83 pages of opening briefing by Plaintiffs,
  - 88 pages of opposition briefing by Defendants,

- 49 pages of reply briefing by Plaintiffs,
- Subsequent supplemental briefing in the *Siegel* case, and
- 105 pages in TRO opinions issued by the Court.

5. *Siegel* Plaintiffs and Defendants requested and received permission to file overlength briefs at the TRO stage.
6. Because *Siegel* Plaintiffs sought a TRO on only Chapter 131's place-based restrictions, the TRO responsive briefing did not involve additional claims by *Siegel* Plaintiffs, including on liability insurance and permitting challenges.
7. Defendants initially requested separate PI briefing that bifurcates the claims already reviewed in the TRO proceedings and the additional claims. This Court indicated a preference for consolidated submissions.
8. Since those proceedings, Plaintiffs have filed amended pleadings and declarations. *See* D.E. 63 to D.E. 71.
9. To conduct the historical inquiry under *New York State Rifle & Pistol Ass'n, Inc. v. Bruen*, 142 S. Ct. 2111 (2022), the State must identify and discuss historical evidence in its brief, which requires a significant portion of space.

10. Defendants respectfully request that the Court grant leave to file a 100 page brief in opposition to Plaintiffs' Motions for Preliminary Injunction.

11. On February 9, 2023, I requested Plaintiffs' consent to file this motion. I have not received a response.

I declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: /s/ Angela Cai  
Angela Cai  
Deputy Solicitor General

Dated: February 10, 2023